

3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Requests for Production in the appropriate sequence.

4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

5. That all exhibits be reduced to an 8 1/2" x 11" format.

6. That each Request be reproduced at the beginning of the response thereto.

7. That Dominion provides the undersigned with responses to these Requests for Production as soon as possible but **not later than twenty (20) days from the date of service hereof.**

8. If the response to any Requests for Production is that the information requested is not currently available, state when the information requested will become available.

9. These Requests for Production shall be deemed continuing so as to require Dominion to supplement or amend its responses as any additional information becomes available up to and through the date of trial.

10. **If a privilege not to answer a Request is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim in a privilege log.**

11. If a refusal to respond to a Request is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

12. Answer each Request on the basis of the entire knowledge of Dominion, including information in the possession of Dominion or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

13. If any Request cannot be answered in full, respond to the extent possible and specify the reasons for Dominion's inability to produce.

14. Please provide copies of any spreadsheets responsive to this request in electronic working spreadsheet (Microsoft Excel) format with all data and formulas intact, to the extent feasible.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **“You” or “your”** shall refer to, Dominion.
2. **The conjunctions “and” and “or” shall be interpreted** in each and every instance as meaning “and/or” and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.
3. **“Document”** shall mean all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in Dominion’s possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA’s, Blackberry’s or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of Dominion and specifically includes the computer and or laptop computers utilized by Representatives of Dominion. Media means media, as broadly as the term “media” may be defined, that contains electronic data, as to the Interaction between Transco or Dominion Energy, Inc. and Dominion.
4. **“SCANA”** shall mean SCANA Corporation and any and all of its affiliates, including South Carolina Electric & Gas Company.
5. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

FIRST REQUESTS FOR PRODUCTION

1. From January 8, 2015, until the date of these presents, please provide all documents discussing steps that Dominion Energy, Incorporated or its affiliates or Atlantic Coast Pipeline has or plans to take to provide natural gas transportation and/or sales service to SCANA, or other markets located in South Carolina.
2. From January 8, 2015, until the date of these presents, please provide all documents that mention the provision of natural gas transportation and/or sales service to SCANA by Dominion or Transco or that mention the provision of natural gas transportation and/or sales service to SCANA by the Atlantic Coast Pipeline prepared in connection with the proposed merger between Dominion and SCANA that mention natural gas transportation and/or sales service to SCANA or that mention the Atlantic Coast Pipeline.
3. Please provide all documents associated with market plans and/or market projections prepared since January 8, 2015, until the date of these presents, that Dominion or Atlantic Coast Pipeline has developed with regard to natural gas transportation and/or sales service to SCANA or other markets located in South Carolina.
4. Please provide a copy of all documents prepared by or for Dominion or Atlantic Coast Pipeline since January 8, 2015, until the date of these presents, which assess their competitive status vis-à-vis other pipelines, or which addresses or discusses Dominion's or Atlantic Coast Pipeline's short-term or long-term business plans, with regard to SCANA or other markets located in South Carolina.
5. Please provide a copy of any studies conducted since January 8, 2015, until the date of these presents, which analyze Dominion's or Atlantic Coast Pipeline's competitive position with respect to the rates and services of other pipelines, in general, serving the Southeastern U.S.
6. Please provide all Dominion and Atlantic Coast Pipeline management, management committee and board(s) of directors presentations since January 8, 2015, until the date of these presents, that pertain to SCANA or other markets located in South Carolina.
7. Please provide a copy of all presentations made by Dominion (or by others on behalf of Dominion) to credit or bond rating agencies since January 8, 2015, until the date of these presents, and any documents that relate to such presentations, that include any information regarding SCANA or other markets located in South Carolina.
8. Please provide all presentation(s) made by Dominion to securities analysts and/or financial institutions since January 8, 2015, until the date of these presents, and any documents that relate to such presentations, that include any information regarding SCANA or other markets located in South Carolina.

9. Please provide copies of all prior responses to discovery requests in this proceeding that relate to natural gas transportation and/or sales service to SCANA or other markets located in South Carolina.
10. If You object to delineating those portions of prior discovery requests in “9” hereinabove, pertaining to “natural gas, transportation, and/or sales or service to SCANA”, please provide copies of all prior discovery requests, in full.

/s/Jefferson D. Griffith, III

Jefferson D. Griffith, III,

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September 20, 2018
Columbia, South Carolina